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VIA ECF

Honorable Analisa Torres
United States District Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

Re: Yafai, et al. v Cuccinelli, et al., No. 20 Civ. 2932 (AT)

Dear Judge Torres,

This office represents Plaintiffs in the above-referenced action. Plaintiffs write on behalf of both sides regarding the initial conference and deadline to submit a joint letter and case management plan, currently scheduled for February 18, 2021 and February 11, 2021. In light of the court's order that Plaintiffs file an amended complaint in this matter on or before March 15, 2021, the parties respectfully request that the above deadlines be adjourned *sine die*. This is the seventh request to adjourn the initial conference, which prior requests the Court has graciously granted. *See* ECF No. 54, fn 1.

The parties will continue to discuss the resolution of this matter absent further litigation, and the additional time will allow the government to respond to the amended complaint and adjudicate the underlying matter of minor child S.A.'s immigrant visa petition, as discussed in this office's prior letter to the court dated February 3, 2021. *See* ECF No. 64. Further, Plaintiffs acknowledge that we are within the 48 hour period provided by the Court for adjournment requests with respect to the deadline to file a case management plan, and we apologize with regard to the timing of this application. In preparing to discuss a plan with the government, we realized that it made little sense to submit such a plan until after the amended complaint has been filed and the government has had an opportunity to respond, especially if the Court grants the parties' timely request to adjourn the initial conference scheduled for next week. If necessary, the parties will submit a case management plan as scheduled.

Counsel for the government joins in this application. Plaintiffs thank the Court for its time and consideration of this matter.

GRANTED in part, DENIED in part. The conference scheduled for February 18, 2021, is ADJOURNED to **May 18, 2021, at 11:00 a.m.** By **May 11, 2021**, the parties shall submit their joint letter and case management plan.

Respectfully Submitted,

SO ORDERED.

/s/ Julie A. Goldberg, Esq.
Julie A. Goldberg, Esq.

Dated: February 11, 2021
New York, New York



ANALISA TORRES
United States District Judge